

Name Richard Louis Brown - PRO SE LITIGANT
Street Address 3225 43rd Street
City and County Sacramento, Sacramento County
State and Zip Code California, 95817
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FILED

NOV 25 2024

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
[Signature]
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

Richard Louis Brown

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

SEIU Local 1000

Service Employees International Union (SEIU)

California State Employees Association (CSEA)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 2:24-cv-3276 DJC JDP PS
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Richard Louis Brown
Street Address	3225 43rd Street
City and County	Sacramento, Sacramento County
State and Zip Code	California, 95817
Telephone Number	408-207-2339

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	SEIU Local 1000
Job or Title (if known)	California's largest public sector employees' union
Street Address	1808 14th Street
City and County	Sacramento, Sacramento County
State and Zip Code	California, 95811
Telephone Number	866-471-7348

Defendant No. 2

Name	Service Employees International Union (SEIU)
Job or Title (if known)	U.S. international labor union
Street Address	1800 Massachusetts Ave NW
City and County	Washington, DC
State and Zip Code	Washington, DC 20036
Telephone Number	202-730-7184

Defendant No. 3

Name	California State Employees Association (CSEA)
Job or Title (if known)	California federation of four affiliated organizations
Street Address	3000 Advantage Way
City and County	Sacramento, Sacramento County
State and Zip Code	California, 95834
Telephone Number	(916) 444-8134

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

II. Basis for Jurisdiction

Federal Courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in Federal Court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same state as any plaintiff.

What is the basis for Federal Court jurisdiction? *(check all that apply)*

☐ Federal question

☐ Diversity of citizenship

U.S. Constitution - 1st, 8th, 14th and 15th Amendments

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

U.S. Constitution - 1st, 8th, 14th and 15th Amendments

Federal Rules of Civil Procedure Rule 8(f) General Rules of Pleading

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Local 1000 President/Plaintiff was racially removed from office - this violated his freedom of speech and equal protection of law. Plaintiff was racially denied his due process to have his lawsuit heard by a requested jury trial. Plaintiff was subjected to cruel/unusual punishment to pay an Anti-Slapp award that violated his freedom of speech in legally addressing his racial removal from office. Plaintiff was denied the right to vote/run for reelection.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff seeks: immediate reinstatement to the office as Local 1000 President and to California State service; removal of the Local 1000 Board of Directors and bar them from reelection for gross intentional misconduct; grant disaffiliation from SEIU and CSEA for supporting a "coup" against a democratic election; grant \$21 million dollars to Plaintiff for emotional stress and lost of his good name and character by the actions of the 3 Defendants.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: November 25, 2024.

Signature of Plaintiff	<u>Richard Louis Brown</u>
Printed Name of Plaintiff	<u>Richard Louis Brown</u>